

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INFORMATION

UNITED STATES OF AMERICA :

S5 16 Cr. 170 (JGK)

- v. - :

DERRICK WILLIAMS, :
a/k/a "Blood," :

Defendant. :

- - - - -X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: **MAR 04 2016**

COUNT ONE

(Conspiracy to Commit Mail Fraud and Wire Fraud)

The United States Attorney charges:

1. From at least in or about January 2012 up to and including at least in or about December 2013, in the Southern District of New York and elsewhere, DERRICK WILLIAMS, a/k/a "Blood," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341, and to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that DERRICK WILLIAMS, a/k/a "Blood," the defendant, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and

property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and would and did take and receive therefrom, such matter and thing, and knowingly would and did cause such matter and thing to be delivered by mail and by such carrier according to the direction thereon and at the place at which it was directed to be delivered by the person to whom it was addressed, in violation of Title 18, United States Code, Section 1341, to wit, WILLIAMS agreed with others to and did receive through the mail and cash rental assistance checks to which he and co-conspirators were not entitled, including checks in the names of others, in furtherance of a scheme to defraud an emergency rental assistance program, administered by the New York City Human Resources Administration ("HRA").

3. It was further a part and an object of the conspiracy that DERRICK WILLIAMS, a/k/a "Blood," the defendant, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses,

representations and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343, to wit, WILLIAMS agreed with others to and did receive payments on electronic benefit transfer cards to which he and co-conspirators were not entitled, in furtherance of a scheme to defraud the Supplemental Nutrition Assistance Program, administered by HRA.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As a result of committing the offense charged in Count One of this Information, DERRICK WILLIAMS, a/k/a "Blood," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real or personal, constituting or derived, directly or indirectly, from proceeds traceable to the commission of such offense, including but not limited to a sum of United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of DERRICK WILLIAMS, a/k/a "Blood," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853(b); Title 28, United States Code, Section 2461(c).)


PREET BHARARA 
UNITED STATES ATTORNEY